

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP,

*Defendant.*

No. 22 Civ. 10016 (LAK)

DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF  
PLAINTIFF E. JEAN CARROLL'S MEMORANDUM OF LAW IN OPPOSITION TO  
DEFENDANT DONALD J. TRUMP'S MOTION FOR A NEW TRIAL OR  
REMITTITUR

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's memorandum of law in opposition to Defendant Donald J. Trump's motion for a new trial or remittitur.

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the official transcript of the trial in this action.

4. Attached hereto as **Exhibit 2** is a true and correct copy of PX-1, which was entered into evidence during the trial in this action.

5. Attached hereto as **Exhibit 3** is a true and correct copy of PX-2, which was entered into evidence during the trial in this action.

6. Attached hereto as **Exhibit 4** is a true and correct copy of PX-3, which was entered into evidence during the trial in this action.

7. Attached hereto as **Exhibit 5** is a true and correct copy of PX-4, which was entered into evidence during the trial in this action.

8. Attached hereto as **Exhibit 6** is a true and correct copy of an excerpt from the Defendant's deposition designations, which were marked as PX-200-T and entered into evidence during the trial in this action.

9. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the official transcript of the trial in *Breest v. Haggis*, No. 161137/2017 (N.Y. Sup. Ct., N.Y. Cty. 2022).

10. Attached hereto as **Exhibit 8** are true and correct copies of PX-45, 46, 48, 51, 53, 57, which were entered into evidence during the trial in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
June 22, 2023



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Roberta A. Kaplan